

12/8/03



**BellSouth Telecommunications, Inc.**  
**Legal Department**  
1600 Williams Street  
Suite 5200  
Columbia, SC 29201

December 8, 2003

**Patrick W. Turner**  
General Counsel-South Carolina  
  
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The Honorable Bruce Duke  
Acting Executive Director  
Public Service Commission of SC  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: Analysis of Continued Availability of Unbundled Local Switching for  
Mass Market Customers Pursuant to the Federal Communication  
Commission's Triennial Review Order  
(Docket No. 2003-326-C)

Dear Mr. Duke:

Enclosed for filing are the original and fifteen copies of BellSouth Telecommunications, Inc.'s First Set of Interrogatories and First Requests for Production of Documents served on the following entities in the above-referenced matters.

American Communications Services, Inc.  
American Communication Company, Inc.  
American Communications Services of Charleston, Inc.  
American Communications Services of Columbia, Inc.  
American Communications Services of Greenville, Inc.  
American Communications Services of Spartanburg, Inc.  
American Communications Services of Greenville, S.C., Inc.  
Business Telecom, Inc.  
Fairfield Communications  
Fairfield Communications, Inc.  
FTC Diversified Services  
FTC Communications, Inc.  
FTC Diversified Services, Inc.  
Hargray, Inc.  
Hargray Telephone Company, Inc.  
Hargray Wireless, LLC  
Hargray of Georgia, Inc.  
Hargray Communications Group, Inc.  
HTC Communications, Inc.  
Knology Holdings, Inc.  
Knology of Charleston, Inc.  
Knology of South Carolina, Inc.  
Level 3 Communications, LLC  
M Power Investments, LLC

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Omnicall, Inc.  
PBT Communications, Inc.  
PBT Telecom, Inc.  
PRT Communications, LLC  
SCANA Communications, Inc.  
SCANA Corporation  
SCANA Resources, Inc.  
SCANA Services, Inc.  
South Carolina Net, Inc.  
Springboard Telecom, LLC  
Sprint Communications, L.P.  
Sprint/United Telephone  
Sprint Communications Company, L.P.  
Sprint International Communications Corporation  
Sprint Spectrum Holding Company, L.P.  
Sprint Spectrum, L.P.  
Sprint/United Management Company  
Sprint Mid-Atlantic Telecom, Inc.  
Sprintcom, Inc.  
Sprint, Inc.  
Sprint Solutions, Inc.  
US LEC of South Carolina, Inc.  
US LEC Communications, Inc.  
US LEC of South Carolina LLC  
Verizon Select Services, Inc.  
West Carolina Communications, LLC

I am serving each of these entities with a copy of the discovery requests directed to that entity as reflected by the Certificates of Service attached to the respective documents.

I am also serving all parties of record as reflected by the Certificates of Service.

Sincerely,

  
Patrick W. Turner

PWT/nml  
Enclosures  
PC Docs # 516281